

1 LAW OFFICES OF DALE K. GALIPO
2 Dale K. Galipo, Esq. (Bar No. 144074)
dalekgalipo@yahoo.com
3 Shannon J. Leap (Bar No. 339574)
sleap@galipolaw.com
4 21800 Burbank Boulevard, Suite 310
Woodland Hills, California 91367
5 Tel: (818) 347-3333
Fax: (818) 347-4118

6 *Attorneys for Plaintiffs A.J.P., et al.*

7
8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10
11 A.J.P. and A.M.P., minors, by and
12 through their guardian *ad litem* Cynthia
Nunez, individually and as successor in
13 interest to Albert Perez, deceased; and
PATRICIA RUIZ, individually,

14 Plaintiffs,

15 vs.

16 COUNTY OF SAN BERNARDINO;
and DOES 1-10, inclusive,

17 Defendants.

Case No. 5:22-cv-01291-SSS-SHK

*Hon. Sunshine S. Sykes,
Hon. Magistrate Shashi H. Kewalramani*

**DECLARATION OF SHANNON J.
LEAP IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

[Filed concurrently with Plaintiffs' Memorandum of Points and Authorities in Opposition; Plaintiffs' Separate Statement of Facts and Additional Material Facts, Plaintiffs' Objections to Defendants' Evidence, Declaration of Scott DeFoe, and Declaration of Bennet Omalu, M.D.).

Date: April 19, 2024

Time: 2:00 P.M.

Courtroom: Courtroom 2, 2nd Floor

DECLARATION OF SHANNON J. LEAP

I, Shannon J. Leap, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California and the United States District Court for the Central District of California. I am one of the attorneys of record for the Plaintiffs. I make this declaration in support of Plaintiffs' Opposition to Defendants' Motion for Summary Judgment. I have personal knowledge of the facts contained herein and could testify competently thereto if called.

2. Attached hereto as "**Exhibit 1**" is a true and correct copy of the relevant pages of Deputy David Moore's Deposition ("Moore Depo"), taken on September 15, 2023.

3. Attached hereto as "**Exhibit 2**" is a true and correct copy of the relevant pages of Deputy Andrew Pollick's Deposition ("Pollick Depo"), taken on September 15, 2023.

4. Attached hereto as "**Exhibit 3**" is a true and correct copy of the relevant pages of Deputy Christina Olivas' Deposition ("Olivas Depo"), taken on October 3, 2023.

5. Attached hereto as "**Exhibit 4**" is a true and correct copy of the relevant pages of Corporal Cory McCarthy's Deposition ("McCarthy Depo"), taken on November 9, 2023.

6. Attached hereto as "**Exhibit 5**" is a true and correct copy of the relevant pages of Deputy Joshua Stone's Deposition ("Stone Depo"), taken on December 14, 2023.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28